

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

AGENCY INSURANCE COMPANY OF  
MARYLAND,

Plaintiff,

v.

PLACIDA PAULINO and IDALIS  
PAULINO,

Defendants.

CIVIL ACTION NO. 3:21-cv-00767-  
MEM

**JOINT STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

IT IS HEREBY STIPULATED by and between the parties hereto that DEFENDANTS PLACIDA PAULINO AND IDALIS PAULINO may have additional time within which to answer Plaintiff's complaint. Therefore, the last day for defendants to answer plaintiff's complaint will be Friday, August 27, 2021.

Good cause exists for this extension as the parties continue to discuss the possibility of a negotiated resolution. Additionally, defendants are currently appearing pro se and would like time to secure defense counsel if a negotiated resolution is not reached. Plaintiff's counsel has agreed to this extension. This is the second request for an extension.

Dated: July 27, 2021

<b>DEFENDANTS</b>	<b>COUNSEL FOR PLAINTIFF POST &amp; SCHELL, P.C.</b>
By: <u>s/ Placida Paulino</u> Placida Paulino	By: <u>s/ Kevin T. McGarry</u> Kevin T. McGarry, Esquire I.D. #: PA313204 1869 Charter Lane P.O. Box 10248 Lancaster, PA 17605-0248 (717) 291-4532 (717) 291-1609 – Fax <a href="mailto:kmcgarry@postschell.com">kmcgarry@postschell.com</a>
By: <u>s/ Idalis Paulino</u> Idalis Paulino	

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant should answer or otherwise respond to Plaintiff's complaint on or before Friday, August 27, 2021.

Dated: \_\_\_\_\_

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THE HONORABLE MALACHY E. MANNION,  
UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I, Kevin T. McGarry, Esquire do hereby certify that I caused a true and correct copy of the foregoing document(s) to be served upon the following person(s) at the following address(es) by sending same via Electronic Service (same is available for viewing and downloading from the ECF system):

Placida Paulino  
201 Maple Lane  
East Stroudsburg, PA 18302  
*Via U.S. First Class Mail*

Idalis Paulino  
201 Maple Lane  
East Stroudsburg, PA 18302  
*Via U.S. First Class Mail*

**POST & SCHELL, P.C.**

By: s/ Kevin T. McGarry  
Attorney for Plaintiff  
Kevin T. McGarry, Esquire  
I.D. #: PA313204

DATE: July 28, 2021